

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES	)	
	)	
Plaintiffs,	)	
	)	No. 15 CR 526
v.	)	
	)	Judge LEINENWEBER
THADDEUS JIMENEZ, et al	)	
	)	
Defendants.	)	

**DEFENDANT’S MOTION TO PLACE GOVERNMENT EXHIBITS UNDER SEAL**

Defendant THADDEUS JIMENEZ, by his attorney, respectfully moves this Court to seal the exhibits submitted by the government as part of its sentencing memo. In support thereof, Defendants state as follows:

1. The government has submitted to this Court videos and other materials as exhibits to its Sentencing Memorandum (Doc. 87).
2. The exhibits, A-D, include two graphic videos, a transcript and screen grabs from the videos, as well as correspondence written by the Defendant while in prison.
3. Defendant believes this material should remain under seal until after sentencing for the following reasons:
  - A. The material is of a graphic and incendiary nature, especially if publically viewed out of context with other information and materials in this case.
  - B. Release of these materials would tend to inflame public opinion and make the Defendant the target of retribution while in custody.

C. Release of this information may place the life of the Defendant in jeopardy.

WHEREFORE, Defendant respectfully requests that this Court seal the submitted exhibits until after sentencing is completed.

Respectfully submitted,

By: /s/Steven A. Greenberg

Steven A. Greenberg  
53 W. Jackson, Suite 1260  
Chicago, Illinois 60604  
(312) 879-9500